F. Gordon Maxson
Director - Regulatory Affairs

GTE

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December 15, 1999

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Washington, DC 20554

Re: Ex Parte Filing - CC Docket No. 92-237 (CIC Codes)

Dear Ms. Salas:

This is to advise that Norman Epstein, George Ageno and I of GTE met with Diane
Harmon and David Ward of the Network Services Division today to renew the request
for the assignment of CIC Code 6682 to GTE Pacifica Incorporated.

A copy of the materials used in the presentation is attached.

Sincerely,

Attachment

C: Diane Harmon
     David Ward

CIC Code Request
For

GTE Pacifica Incorporated

December 15, 1999

GTE Request and History

GTE

- GTE Pacifica is requesting a CIC Code for 800 Service and for FG "D" dial around service

- GTE Pacifica has been unable to compete in CNMI without its own CIC Code

- GTE Pacifica has requested a code in the past and was asked to investigate using other GTE CICs

- GTE Pacifica cannot utilize these other codes

- The study indicates that a CIC is still required
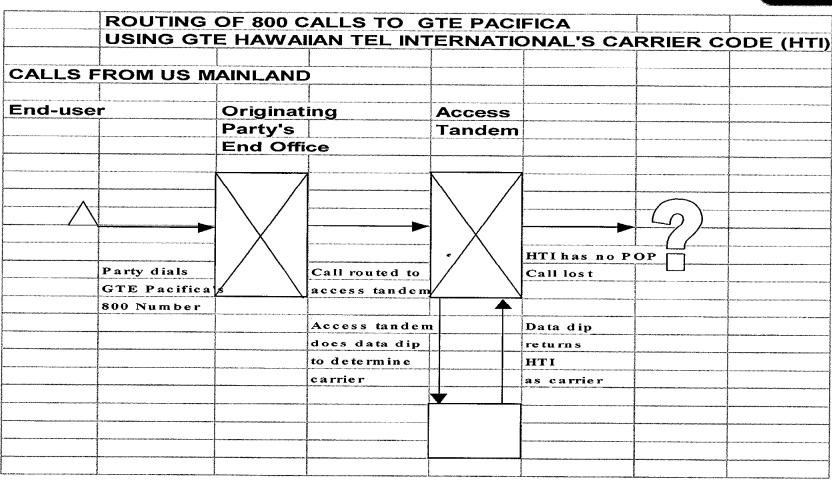
Existing CICs Assigned directly to GTE

GTE

- CIC 0015 assigned to GTE Hawaiian Tel International
- CIC 5483 assigned to GTE Card Services/GTE LD
- CIC 6224 assigned to GTE Card Services/GTE LD
- CIC 5249 assigned to GTE Card Services/GTE LD
- CIC 5448 assigned to GTE Tel Operations
- **CIC 6682 set aside for GTE Micronesian Tel Corp**

Rationale for not using existing GTE CICs

GTE

- Since the codes are already assigned to other GTE divisions it will be impossible to differentiate between them without a different CIC Code

- GTE Pacifica calls will not be uniquely identifiable without a separate CIC Code

- Lacking a CIC Code GTE Pacifica will not be able to offer dial around service in CNMI

- The use of other GTE CICs may also lead to concerns of equal treatment to all GTE customers
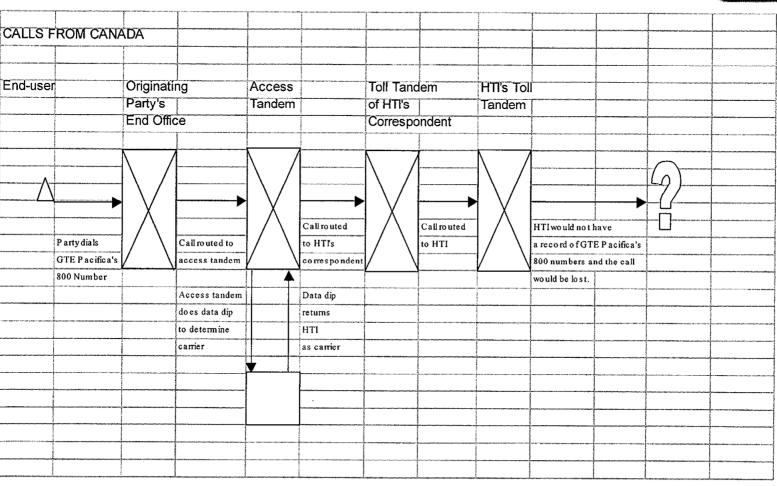
Routing Scenario

ROUTING OF 800 CALLS TO GTE PACIFICA
USING GTE HAWAIIAN TEL INTERNATIONAL'S CARRIER CODE (HTI)

CALLS FROM US MAINLAND

End-user	Originating Party's End Office	Access Tandem	
Party dials GTE Pacifica's 800 Number	Call routed to access tandem		HTI has no POP Call lost
	Access tandem does data dip to determine carrier		Data dip returns HTI as carrier

Routing Scenario

GTE

CALLS FROM CANADA

End-user	Originating Party's End Office	Access Tandem	Toll Tandem of HTI's Correspondent	HTI's Toll Tandem

Party dials GTE Pacifica's 800 Number

Call routed to access tandem

Access tandem does data dip to determine carrier

Call routed to HTI's correspondent

Data dip returns HTI as carrier

Call routed to HTI

HTI would not have a record of GTE Pacifica's 800 numbers and the call would be lost.

Routing Scenario

GTE

ROUTING OF 800 CALLS TO GTE PACIFICA USING GTE COMMUNICATIONS CORP CARRIER CODE					
End-user	Originating Party's End Office	Access Tandem	Worldcom Toll Tandem	GTE Access Tandem	
Party dials GTE Pacifica's 800 Number	Call routed to access tandem	call routed to WorldCom toll tandem	WorldCom determines carrier as GTE and routes	GTE would not have the number in its customer database; call	
	Access tandem does data dip to determine carrier	Data dip returns WorldCom as carrier	call to GTE access tandem	would be lost.	
				Even if GTE were to determine the call should be routed to GTE Pacifica there are no circuits between GTE and GTE Pacifica.	

Today's Unbalanced Situation

GTE

- GTE is one of the largest Telecommunications companies in the country and only has 5 directly assigned CICs

- Other companies have many more codes assigned to them

- The INC has recently been faced with multiple companies requesting transferal of CICs as a result of partial acquisitions

- Acquisitions should not be the only way a company can obtain CICs

- GTE requests that the FCC grant GTE Pacifica and Wireless each a CIC code to enable them to provide competitive services

Similar Unbalanced Wireless Situation

GT3

- GTE Wireless does not currently have a CIC code assigned to it.

- It is impractical for GTEW to use any of the other CICs assigned to GTE because they are being used by other business units, which would causing billing confusion.

- Some LECs require wireless carriers to have a CIC to terminate interMTA toll traffic to their tandems.

- Denying GTEW a CIC would be contrary to the public interest because it would deny GTEW the opportunity of doing business by terminating its interMTA traffic directly to these LECs.